

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>ELIZABETH HORTON</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>DON WILLIAMS, individually and in his</b>	)	
<b>capacity as the Manager of National</b>	)	
<b>Seating and Mobility, Inc., NATIONAL</b>	)	
<b>SEATING AND MOBILITY, INC.,</b>	)	
<b>GERALD SHOCKLEY, individually,</b>	)	
	)	
<b>Defendants.</b>	)	
	)	
	)	
	)	
	)	<b>CIVIL ACTION NUMBER: 2:06-cv-526-MHT-TFM</b>

**DEFENDANTS NATIONAL SEATING AND MOBILITY AND DON WILLIAMS'  
EXHIBIT LIST**

Defendants National Seating and Mobility and Don Williams pursuant to the Court's Scheduling Order in this matter and Rule 26(a)(3) of the Federal Rules of Civil Procedure, designate the following exhibits:

<b>A</b>	Deposition of Elizabeth Horton, w/ exhibits: <ol style="list-style-type: none"> <li>1. Notice of Deposition Duces Tecum</li> <li>2. 3/22/06 termination letter from Hyundai</li> <li>3. NSM client database with notations by Horton</li> <li>4. 1/24/05 Application to Hyundai</li> <li>5. Horton resume</li> </ol>
<b>B</b>	Deposition of Felicia Barrow, w/ exhibits: <ol style="list-style-type: none"> <li>1. 5/9/05 transcript of interview with Don Williams</li> <li>2. 6/23/05 transcript of interview with Felicia Barrow</li> </ol>
<b>C</b>	Deposition of Cliff Johnson, w/ exhibit: <ol style="list-style-type: none"> <li>1. 6/14/05 and 7/12/04 Memoranda from Johnson re: NSM</li> </ol>
<b>D</b>	Deposition of Anthony Green, w/ exhibits: <ol style="list-style-type: none"> <li>1. Confidential Medicaid Complaint and Report of Investigation</li> <li>2. NSM client database with notations by Horton</li> </ol>

	3. 8/12/05 Summary Report of Investigation by Shockley
<b>E</b>	First affidavit of Gerald G. Shockley w/ attachments: <ol style="list-style-type: none"> <li>1. 7/9/04 referral memorandum</li> <li>2. 6/1/05 transcript of interview with Michael Roeder</li> <li>3. Affidavit and Warrant</li> </ol>
<b>F</b>	Second affidavit of Gerald Shockley w/ attachment: <ol style="list-style-type: none"> <li>A. 8/12/05 Summary Report of Investigation by Shockley</li> </ol>
<b>G</b>	Affidavit of Michael Roeder
<b>H</b>	Affidavit of Don Williams
<b>I</b>	Declaration of Danielle Pirkle w/ exhibit: <ol style="list-style-type: none"> <li>A. 6/28/05 transcript of interview with Danielle Pirkle</li> </ol>
<b>J</b>	Medical Records for Elizabeth Horton: <p>Advanced Medical Imaging Records for Horton  Baptist Medical South Records for Horton  Bridger Pathology Lab Records for Horton  Dr. Goodman Medical Records for Horton  Dr. Huynh medical records for Horton  Dr. Jacob Griffin's Records for Horton  Dr. King Medical Records for Horton  Dr. Looney medical records for Horton  Dr. May medical records for Horton  Dr. Pinchback medical records for Horton  Jackson Hospital Medical Records for Horton  Pri-Med Medical Records for Horton  Southern Diagnostic Labs Records for Horton  Taylor Eye Clinic Records for Horton</p>
<b>K</b>	Alabama Medicaid Agency Investigation File
<b>L</b>	Employment Records for Elizabeth Horton from Kelly Services
<b>M</b>	Employment Records for Elizabeth Horton from Hyundai Motor Manufacturing Alabama, LLC

Defendants National Seating and Mobility and Don Williams reserve the right (a) to supplement this list, (b) not to offer and/or to object to the use of all or any portion of the foregoing by any other party, (c) to offer as a separate exhibit any portion of or any summary of any of the foregoing, (d) to offer an enlargement of any of the foregoing, (e) to use any document identified in subsequent discovery, (f) to use any exhibit listed by any other party if Defendants' objection thereto is waived or overruled, (g) to use any document marked as an exhibit during

any deposition in this matter, (h) to use other documents for rebuttal and/or impeachment, (i) to use any documents which have been requested or produced during discovery in this case, regardless whether the same has been produced, (j) to use any document produced by any non-party, and (k) to use any document requested of any non-party, regardless whether the same has been produced.

Respectfully submitted this 14th day of May, 2008.

s/Dorman Walker

Dorman Walker (WAL086)

Kelly F. Pate (FIT014)

Balch & Bingham

P.O. Box 78

Montgomery, AL 36101

Telephone: (334) 834-6500

Facsimile: (334) 269-3115

**Attorneys for Defendant Don Williams**

s/Charles A. Stewart III

Charles A. Stewart III (STE067)

Quindal C. Evans (EVA040)

Bradley Arant Rose & White LLP

The Alabama Center for Commerce

401 Adams Avenue, Suite 780

Montgomery, AL 36104

Telephone: (334) 956-7700

Facsimile: (334) 956-7701

**Attorneys for National Seating & Mobility, Inc.**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of May, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Deborah M. Nickson  
Attorney for Petitioner  
2820 Fairlane Drive, Suite A-10  
Montgomery, Alabama 36116

Jack W. Wallace, Jr.  
Office of the Attorney General  
11 South Union Street  
Montgomery, AL 36130

s/Charles A. Stewart  
\_\_\_\_\_  
Of Counsel